

~~FILED~~

UNITED STATES DISTRICT COURT
for the

Northern District of Indiana

United States of America

v.

Drakkar Boyd

)

Case No.

At ROBERT N. TRGOVICH, Clerk M
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

2015 MJ 117

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

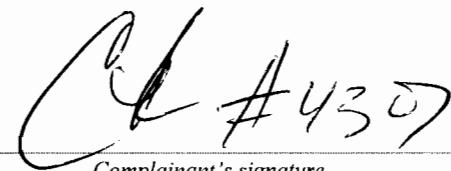
On or about the date(s) of April 15, 2015 in the county of Lake in the
Northern District of Indiana, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC Section 922(g)(1)	Felon Possessing Firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.



Complainant's signature

ATF Special Agent Cindy Bernd

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/02/2015

S/Andrew P. Rodovich

Judge's signature

City and state: Hammond, Indiana

U.S. Magistrate Judge Andrew P. Rodovich

Printed name and title

AFFIDAVIT

Cindy Bernd, Special Agent, Bureau of Alcohol, Tobacco, Firearms and Explosives, being sworn, deposes and states the following:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and have been so employed since September of 2001. I am currently assigned to the HIDTA Firearms Interdiction Regional Enforcement (FIRE) Task Force within the Chicago Field Division and have been so assigned since November 2014. My responsibilities include the investigation of Federal firearms and narcotics trafficking and firearm and narcotics offenses, particularly those committed by criminal street gangs. I have received special training in the enforcement of laws concerning firearms trafficking, narcotics trafficking and gang activity. I have also been involved in various types of electronic surveillance, court authorized wire interceptions, search warrants and debriefing of defendants, witnesses, and informants, as well as others who have knowledge of the trafficking of firearms and narcotics. As part of my current assignment, I have investigated criminal violations of the Gun Control Act to include Title 18 U.S.C §922 and 924, as well as Federal narcotics laws, including Title 21, United States Code, Sections 841(a)(1) and 846.
2. The statements contained in this affidavit are based on investigation, information provided to me by law enforcement officers and others with whom I have worked on this case, and review of documents. This affidavit is being submitted for the limited purpose of establishing probable cause to issue a complaint charging Drakkar Boyd

with possession of firearm by a felon, and I have not included each and every fact known to me or others concerning this investigation.

3. On April 15, 2015, East Chicago Police responded to the area of 3800 Parrish Avenue, East Chicago, Indiana, to investigate a report of a group of males possibly with a firearm. Officer Tomas Garcia arrived in the area and observed an individual, later identified as Drakkar Boyd, holding what appeared to be a long object in the inside of his right pant leg. Boyd fled from police and a foot chase ensued. Officer Garcia observed Boyd drop a long object appearing to be a shotgun over a wooden fence. Boyd was arrested and the object was recovered. This object was determined to be a sawed-off 12 gauge shotgun loaded with six 12 gauge shotgun shells.
4. In a recorded telephone call from jail on April 17, 2015, Drakkar Boyd explained to a female to whom he was talking on the telephone that the police pulled up and that he (Boyd) ran and that he (Boyd) threw the gun. Boyd also stated to the female during the recorded call that he (Boyd) then got on the ground and was arrested. Boyd also stated that to the female during the recorded telephone call that he (Boyd) did not even know why he (Boyd) brought the gun outside.
5. A criminal history check of Drakkar Boyd revealed that Boyd was previously convicted of the felony offense of robbery in 2014 in the Superior Court of Lake County, Indiana, in Cause Number 45G03-1401-FB-00005. This crime is punishable by a term of imprisonment exceeding one year.
6. The ATF determined that the aforementioned firearm was not made in the State of Indiana and therefore traveled in and affected interstate commerce. The ATF

determined that the aforementioned firearm is a sawed-off shotgun with a barrel length of less than 18 inches in length and that the barrel length is approximately 16.5 inches in length. The ATF determined that this shotgun having a barrel length of less than 18 inches in length is not registered to the defendant in the National Firearms Registration and Transfer Record.

7. Based on the above statement of facts, your affiant believes probable cause exists for the issuance of a criminal complaint for Drakkar Boyd for being a felon in possession of a firearm, in violation of Title 18, U.S. Code, Section 922(g) (1).

FURTHER AFFIANT SAYETH NAUGHT.



CINDY BERND, SPECIAL AGENT
BUREAU OF ALCOHOL, TOBACCO
FIREARMS AND EXPLOSIVES

Subscribed and sworn to
before me this 2nd day
of June, 2015



HONORABLE ANDREW P. RODOVICH
UNITED STATES MAGISTRATE JUDGE